INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

September 3, 2003

TO: Interested Parties / Applicant

RE: ADM/Growmark / MSOP 173-17164-00011

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 8/11/03

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NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

ADM/Growmark
Highway 662
Newburgh, Indiana 47630

(herein known as the Permittee) is hereby authorized to *construct and* operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 173-17164-00011	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 3, 2003 Expiration Date: September 3, 2008

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary country grain elevator source.

Authorized Individual:	Vice President of Manufacturing and Technical Services
Source Address:	PO Box 5169, Newburgh, Indiana,47630
Mailing Address:	Highway 662, Newburgh, Indiana,47630
General Source Phone:	812-853-2986
SIC Code:	5153
County Location:	Warrick
Source Location Status:	Attainment for all criteria pollutants Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) One (1) truck receiving facility, known as dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour, equipped with a baghouse dust collector for air pollution control, exhausting to stack No. 1.

(b) One (1) truck receiving facility, known as dump 2, constructed in 1980, with a maximum throughput of 30,000 bushels per hour, equipped with baffles for air pollution control.

(c) One (1) truck receiving facility, known as dump 3, constructed in 1983, with a maximum throughput of 15,000 bushels per hour, equipped with a baghouse dust collector for air pollution control, exhausting to stack No. 3.

(d) One (1) truck loadout, known as loadout-dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour.

(e) One (1) truck loadout, known as loadout-bin 9, constructed in 1992, with a maximum throughput of 5,000 bushels per hour.

(f) One (1) truck loadout, known as loadout-bin 10, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.

(g) One (1) truck loadout, known as loadout-bin 11, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.

(h) One (1) grain cleaner, constructed in 2000, with a maximum throughput of 15,000 bushels per hour.

(i) One (1) column grain dryer, rated at 32 MMBTU, with a maximum throughput of 3,000 bushels per hour.

(j) One (1) barge belt, constructed in 1975, with a maximum throughput of 30,000 bushels per hour.

(k) Internal handling operations, constructed in 1975, consisting of conveyors.

(l) Three (3) storage bins, known as bins 1, 2 and 3, constructed in 1975, each with a storage capacity of 20,000 bushels.

(m) Two (2) storage bins, known as bins 4 and 5, constructed in 1975, each with a storage capacity of 100,000 bushels.

(n) One (1) storage bin, known as bin 6, constructed in 1986, with a storage capacity of 1,000,000 bushels.

(o) Three (3) storage bins, known as bins 7, 8 and 9, constructed in 1992, each with a storage capacity of 30,000 bushels.

(p) Two (2) storage bins, known as bins 10 and 11, constructed in 1999, each with a storage capacity of 5,000 bushels.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-20-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the

conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled by spraying with water on an as needed basis.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and recordkeeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

(a) Whenever a condition in this permit requires the measurement of total static pressure drop

across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.13 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ, shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented when operation begins.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Grain Elevator Operations

(a) One (1) truck receiving facility, known as dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour, equipped with a baghouse dust collector for air pollution control, exhausting to stack No. 1.

(b) One (1) truck receiving facility, known as dump 2, constructed in 1980, with a maximum throughput of 30,000 bushels per hour, equipped with baffles for air pollution control.

(c) One (1) truck receiving facility, known as dump 3, constructed in 1983, with a maximum throughput of 15,000 bushels per hour, equipped with a baghouse dust collector for air pollution control, exhausting to stack No. 3.

(d) One (1) truck loadout, known as loadout-dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour.

(e) One (1) truck loadout, known as loadout-bin 9, constructed in 1992, with a maximum throughput of 5,000 bushels per hour.

(f) One (1) truck loadout, known as loadout-bin 10, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.

(g) One (1) truck loadout, known as loadout-bin 11, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.

(h) One (1) grain cleaner, constructed in 2000, with a maximum throughput of 15,000 bushels per hour.

(i) One (1) column grain dryer, rated at 32 MMBtu, with a maximum throughput of 3,000 bushels per hour.

(j) One (1) barge belt, constructed in 1975, with a maximum throughput of 30,000 bushels per hour.

(k) Internal handling operations, constructed in 1975, consisting of conveyors.

(l) Three (3) storage bins, known as bins 1, 2 and 3, constructed in 1975, each with a storage capacity of 20,000 bushels.

(m) Two (2) storage bins, known as bins 4 and 5, constructed in 1975, each with a storage capacity of 100,000 bushels.

(n) One (1) storage bin, known as bin 6, constructed in 1986, with a storage capacity of 1,000,000 bushels.

(o) Three (3) storage bins, known as bins 7, 8 and 9, constructed in 1992, each with a storage capacity of 30,000 bushels.

(p) Two (2) storage bins, known as bins 10 and 11, constructed in 1999, each with a storage capacity of 5,000 bushels.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 PSD Minor Limit [326 IAC 2-2]

(a) PM from the two primary truck receiving facilities, dump 1 and dump 3, shall be limited to 0.158 pounds per ton of grain throughput, equivalent to 62.8 tons per year when operating at the maximum process weight rate of 797,538 tons per year.

(b) Any increase in grain throughput above 797,538 tons per consecutive twelve (12) month period shall require prior approval from the Office of Air Quality.

(c) Compliance with (a) and (b) will limit the potential to emit PM from the entire source to less than 250 tons per year, and the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, are not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the truck receiving facility known as dump 1, shall not exceed 67.7 pounds per hour, when operating at a process weight rate of 900,000 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the truck receiving facility known as dump 2, shall not exceed 76.2 pounds per hour, when operating at a process weight rate of 1,800,000 pounds per hour.

(c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the truck receiving facility known as dump 3, shall not exceed 67.7 pounds per hour, when operating at a process weight rate of 900,000 pounds per hour.

(d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the truck loading facility known as loadout-dump 1, shall not exceed 67.7 pounds per hour, when operating at a process weight rate of 900,000 pounds per hour.

(e) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from loadout-bin 9, shall not exceed 55.4 pounds per hour, when operating at a process weight rate of 300,000 pounds per hour.

(f) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from loadout-bin 10, shall not exceed 63.0 pounds per hour, when operating at a process weight rate of 600,000 pounds per hour.

(g) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from loadout-bin 11, shall not exceed 63.0 pounds per hour, when operating at a process weight rate of 600,000 pounds per hour.

(h) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grain cleaner, shall not exceed 67.7 pounds per hour, when operating at a process weight rate of 900,000 pounds per hour.

(i) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the column grain dryer, shall not exceed 50.2 pounds per hour, when operating at a process weight rate of 180,000 pounds per hour.

(j) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the barge belt, shall not exceed 76.2 pounds per hour, when operating at a process weight rate of 1,800,000 pounds per hour.

The pounds per hour limitations for items (a) through (j) above were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0\ P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.4 Particulate Control

(a) In order to comply with Conditions D.1.1 and D.1.2 (a) and (c), the baghouses for particulate control shall be in operation and control emissions from the truck receiving facilities known as dump 1 and dump 3 at all times that the truck receiving facilities are in operation.

(b) In order to comply with Condition D.1.2 (b), the baffles for particulate control shall be in operation and control emissions from the truck receiving facility known as dump 2 at all times that the truck receiving facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

(a) Visible emission notations of the baghouse #1 and #3 stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across baghouses #1 and #3 used in

conjunction with the truck receiving facilities, at least once per shift when the truck receiving facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the truck receiving process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Recordkeeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Recordkeeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain monthly records of the grain throughput for the entire source.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the baghouse stack exhausts once per shift .

(c) To document compliance with Condition D.1.6, the Permittee shall maintain the following:

(1) Once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.

(2) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.

(e) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(f) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: ADM/Growmark PHONE NO. : 812-853-2986
LOCATION: Highway 662, Newburgh, IN 47630
PERMIT NO. 173-17164 AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:

MEASURES TAKEN TO MINIMIZE EMISSIONS:

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:
INTERIM CONTROL MEASURES: (IF APPLICABLE)

MALFUNCTION REPORTED BY: _____ TITLE:
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME:

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*** Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**ADM/Growmark**
Address:	**Highway 662**
City:	**Newburgh, IN 47630**
Phone #:	**812-853-2986**
MSOP #:	**173-17164-00011**

I hereby certify that ADM/Growmark is
9 still in operation.
9 no longer in operation.

I hereby certify that ADM/Growmark is
9 in compliance with the requirements of MSOP **173-17164-00011**.
9 not in compliance with the requirements of MSOP **173-17164-00011**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

ADM/Growmark
PO Box 5169
Newburgh, IN 47630

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal knowledge of the
(Company Name)
representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that ADM/Growmark, Highway 662, Newburgh, IN 47630, completed construction of the column grain dryer source on _____ in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Quality on April 11, 2003, and as permitted pursuant to **MSOP No. 173-17164, Plant ID No. 173-00011** issued on .

5. Additional column grain dryers were constructed/substituted as described in the attachment to this document and were not made in accordance with the Construction Permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF)

Subscribed and sworn to me, a notary public in and for County and State of Indiana
on this _____ day of _____, 20 _____.

My Commission expires: .

Signature

Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for New Source Construction and a Minor Source Operating Permit

Source Background and Description

Source Name:	**ADM/Growmark**
Source Location:	**Highway 662, Newburgh, Indiana 47630**
County:	**Warrick**
SIC Code:	**5153**
Operation Permit No.:	**MSOP 173-17164-00011**
Permit Reviewer:	**Patrick Brennan/MES**

The Office of Air Quality (OAQ) has reviewed an application from ADM/Growmark relating to the construction and operation of country grain elevator.

This permit contains provisions intended to satisfy the requirements of the construction permit rules.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) truck receiving facility, known as dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour, equipped with a baghouse dust collector for air pollution control, exhausting to stack No. 1.

(b) One (1) truck receiving facility, known as dump 2, constructed in 1980, with a maximum throughput of 30,000 bushels per hour, equipped with baffles for air pollution control.

(c) One (1) truck receiving facility, known as dump 3, constructed in 1983, with a maximum throughput of 15,000 bushels per hour, equipped with a baghouse dust collector for air pollution control, exhausting to stack No. 3.

(d) One (1) truck loadout, known as loadout-dump 1, constructed in 1975, with a maximum throughput of 15,000 bushels per hour.

(e) One (1) barge belt, constructed in 1975, with a maximum throughput of 30,000 bushels per hour.

(f) Internal handling operations, constructed in 1975, consisting of conveyors.

(g) Three (3) storage bins, known as bins 1, 2 and 3, constructed in 1975, each with a storage capacity of 20,000 bushels.

(h) Two (2) storage bins, known as bins 4 and 5, constructed in 1975, each with a storage capacity of 100,000 bushels.

(i) One (1) storage bin, known as bin 6, constructed in 1986, with a storage capacity of 1,000,000 bushels.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(j) One (1) truck loadout, known as loadout-bin 9, constructed in 1992, with a maximum throughput of 5,000 bushels per hour.

(k) One (1) truck loadout, known as loadout-bin 10, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.

(l) One (1) truck loadout, known as loadout-bin 11, constructed in 1999, with a maximum throughput of 10,000 bushels per hour.

(m) One (1) grain cleaner, constructed in 2000, with a maximum throughput of 15,000 bushels per hour.

(n) Three (3) storage bins, known as bins 7, 8 and 9, constructed in 1992, each with a storage capacity of 30,000 bushels.

(o) Two (2) storage bins, known as bins 10 and 11, constructed in 1999, each with a storage capacity of 5,000 bushels.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

(p) One (1) column grain dryer, rated at 32 MMBtu, with a maximum throughput of 3,000 bushels per hour.

Existing Approvals

The source has constructed or has been operating under the following previous approvals including:

(a) OP 87-11-92-0108, issued on July 17, 1989; and

(b) OP 87-11-92-0109, issued on July 17, 1989.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
Baghouse 1	Dump 1	10.0	-	15,000	77.0
Baghouse 3	Dump 3	10.0	-	15,000	77.0

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

(c) The source submitted a Part 70 Transition application on December 12, 1996. However, the source should have submitted an application for an MSOP by December 25, 1999. Therefore, an enforcement referral will be filed.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 11, 2003, with additional information received on June 6, 2003.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, pages 1 through 3 of 3.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Potential To Emit of New Emission Unit

The potential to emit of the new emission unit, the column grain dryer, is as follows. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	88.0
PM_{10}	23.0
SO_2	0.084
VOC	0.771
CO	11.8
NO_X	14.0

HAPs	Potential To Emit (tons/year)
Benzene	0.00029
Dichlorobenzene	0.000168
Formaldehyde	0.0105
Hexane	0.252
Toluene	0.00048
Lead	0.00007
Cadmium	0.000154
Chromium	0.000196
Manganese	0.000053
Nickel	0.00029
TOTAL	0.265

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1-6(i), and is considered a significant MSOP revision.

Potential To Emit of the Entire Source

The potential to emit of the entire source, including the new emission unit, is as follows. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	258.0
PM_{10}	81.7
SO_2	0.084
VOC	0.771
CO	11.8
NO_X	14.0

HAPs	Potential To Emit (tons/year)
Benzene	0.00029
Dichlorobenzene	0.000168
Formaldehyde	0.0105
Hexane	0.252
Toluene	0.00048
Lead	0.00007
Cadmium	0.000154
Chromium	0.000196
Manganese	0.000053
Nickel	0.00029
TOTAL	0.265

(a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM_{10} are equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of nonfugitive PM_{10} is less than one hundred (100) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7, Part 70.

(c) Fugitive Emissions

(1) This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. The source is not subject to 40 CFR Part 60, Subpart DD, Standards of Performance for Grain Elevators, because it is a Grain Terminal Elevator with a permanent storage capacity less than 2.5 million U.S. bushels. Therefore, the fugitive particulate matter (PM) emissions are not counted toward determination of PSD applicability.

(2) The National Grain and Feed Association has obtained a ruling from the U.S. EPA regarding fugitive emissions from grain elevators. In a letter from Edward J. Lillis, Chief of the U.S. EPA Permit Programs Branch, dated October 14, 1994, to Thomas C. O'Conner, Director of Technical Service of the Association, the Agency stated that grain elevators below the applicable facility size as defined in 40 CFR Part 60, Subpart DD need not consider fugitive emissions when determining major source status.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Receiving (Truck)	62.8	23.5					
Internal Handling	24.3	13.6					
Cleaning	29.9	7.47					
Drying	87.7	21.9					
Storage Bin Vents	9.97	2.51					
Shipping (Truck)	34.3	11.6					
Combustion (Dryer)	0.266	1.07	0.084	0.771	11.8	14.0	0.265
Total Emissions	249	81.7	0.084	0.771	11.8	14.0	0.265

All values in the table represent the maximum unrestricted potential emissions, except particulate emissions. The particulate from the truck receiving is limited by 326 IAC 2-2.

County Attainment Status

The source is located in Warrick County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Warrick County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Warrick County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, and 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	15.0
PM_{10}	4.13
SO_2	-
VOC	-
CO	-
NO_X	-

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed

source categories.

(b) These emissions were based on the current application submitted by the company.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM_{10} (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	88.0	23.0	0.084	0.771	11.8	14.0
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source based on the emissions summarized in this permit, MSOP 173-17164-00011, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) any combination of HAPs is less than twenty-five (25) tons per year.

This is the first operating permit approval issued to this source.

Federal Rule Applicability

(a) This country grain elevator is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300, Subpart DD, because it has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum capacity of the source is 1.36 million U.S. bushels.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.

(c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because (1) the source is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and (2) the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Construction of some facilities at the source commenced prior to August 7, 1977, and was not subject to the PSD requirements of 326 IAC 2-2.

Uncontrolled emissions of particulate matter (PM) from the entire source are 258 tons per year, which is greater than the 250 tons per year PSD threshold. However, the two primary truck receiving facilities, dump 1 and dump 3, are equipped with baghouse dust collectors which will be in operation at all times that these facilities are in operation. In order to ensure that this source is a minor source, pursuant to 326 IAC 2-2, the source has accepted a limit on the potential to emit PM from the two primary truck receiving facilities, dump 1 and dump 3, of 0.158 pounds per ton of grain throughput, equivalent to 62.8 tons per year, and grain throughput shall be limited to 797,538 tons per twelve (12) consecutive month period.

When operating at the maximum process weight rate of 797,538 tons per twelve (12) consecutive month period, the potential PM emissions after control from dump 1 and dump 3 are 0.718 tons per year. Therefore, they will comply with this limit. This will limit the potential to emit PM from the entire source to less than 250 tons per year, and the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Warrick County, and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Each process at the grain elevator source has a process weight in excess of sixty thousand (60,000) pounds per hour. All processing is assumed to be corn, which has a weight of 60 pounds per bushel. The maximum allowable particulate emission from each process shall be limited by the following:

$E = 55 P^{0.11} - 40$ where E = rate of emission in pounds per hour, and
P = process weight rate in tons per hour.

(a) The particulate matter (PM) emissions from the truck receiving facility known as dump 1, shall be limited to 67.7 pounds per hour when operating at a process weight rate of 900,000

pounds per hour (15,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from dump 1 will be 0.180 pounds of particulate per ton of grain processed, or 81.0 pounds per hour. Therefore, this facility is not in compliance without controls. Since the potential to emit particulate matter after control by the baghouse dust collector is 0.81 pounds per hour, dump 1 will comply with this rule. The baghouse must be in operation at all times the truck receiving facility is in operation in order to comply with this limit.

(b) The particulate matter (PM) emissions from the truck receiving facility known as dump 2, shall be limited to 76.2 pounds per hour when operating at a process weight rate of 1,800,000 pounds per hour (30,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from dump 2 will be 0.180 pounds of particulate per ton of grain processed, or 162.0 pounds per hour. Therefore, this facility is not in compliance without controls. However, the facility is equipped with baffles to control particulate during unloading operations, with a control efficiency of 60%. Therefore, particulate emissions after controls are expected to be 64.8 pounds per hour. These baffles shall be in operation at all times dump 2 is in operation in order to comply with this limit.

(c) The particulate matter (PM) emissions from the truck receiving facility known as dump 3, shall be limited to 67.7 pounds per hour when operating at a process weight rate of 900,000 pounds per hour (15,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from dump 3 will be 0.180 pounds of particulate per ton of grain processed, or 81.0 pounds per hour. Therefore, this facility is not in compliance without controls. Since the potential to emit particulate matter after control by the baghouse dust collector is 0.81 pounds per hour, dump 3 will comply with this rule. The baghouse must be in operation at all times the truck receiving facility is in operation in order to comply with this limit.

(d) The particulate matter (PM) emissions from the truck loading facility known as loadout-dump 1, shall be limited to 67.7 pounds per hour when operating at a process weight rate of 900,000 pounds per hour (15,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from the loadout facility will be 0.086 pounds of particulate per ton of grain processed, or 38.7 pounds per hour. Therefore, this facility is in compliance without controls. However, the facility is equipped with socks and sleeves to control particulate during loading operations, with a collection efficiency of 90%. Therefore, particulate emissions after controls are expected to be 3.87 pounds per hour.

(e) The particulate matter (PM) emissions from loadout-bin 9, shall be limited to 55.4 pounds per hour when operating at a process weight rate of 300,000 pounds per hour (5,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the loadout facility will be 0.086 pounds of particulate per ton of grain processed, or 12.9 pounds per hour. Therefore, this facility is in compliance without controls. However, the facility is equipped with socks and sleeves to control particulate during loading operations, with a collection efficiency of 90%. Therefore, particulate emissions after controls are expected to be 1.29 pounds per hour.

(f) The particulate matter (PM) emissions from loadout-bin 10, shall be limited to 63.0 pounds per hour when operating at a process weight rate of 600,000 pounds per hour (10,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the loadout facility will be 0.086 pounds of particulate per ton of grain processed, or 25.8 pounds per hour. Therefore, this facility is in compliance without controls. However, the facility is equipped with socks and sleeves to control particulate during loading operations, with a collection efficiency of 90%. Therefore, particulate emissions after controls are expected to

be 2.58 pounds per hour.

(g) The particulate matter (PM) emissions from loadout-bin 11, shall be limited to 63.0 pounds per hour when operating at a process weight rate of 600,000 pounds per hour (10,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the loadout facility will be 0.086 pounds of particulate per ton of grain processed, or 25.8 pounds per hour. Therefore, this facility is in compliance without controls.

(h) The particulate matter (PM) emissions from the grain cleaner shall be limited to 67.7 pounds per hour when operating at a process weight rate of 900,000 pounds per hour (15,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the grain cleaning facility will be 0.075 pounds of particulate per ton of grain processed, or 33.8 pounds per hour. Therefore, this facility is in compliance without controls. However, the facility is equipped with an enclosure to control particulate, with a collection efficiency of 99%. Therefore, particulate emissions after controls are expected to be 0.338 pounds per hour.

(i) The particulate matter (PM) emissions from column grain dryer shall be limited to 50.2 pounds per hour when operating at a process weight rate of 180,000 pounds per hour (3,000 bushels). Emissions calculations based on AP-42 indicate that emissions from the loadout facility will be 0.22 pounds of particulate per ton of grain processed, or 19.8 pounds per hour. Therefore, this facility is in compliance without controls.

(j) The particulate matter (PM) emissions from the barge belt shall be limited to 76.2 pounds per hour when operating at a process weight rate of 1,800,000 pounds per hour (30,000 bushels). Emissions calculations based on AP-42 indicate that uncontrolled emissions from the barge belt will be 0.061 pounds of particulate per ton of grain processed, or 54.9 pounds per hour. Therefore, this facility is in compliance without controls.

326 IAC 6-4 (Fugitive Dust Emission Limitations)

This rule requires that the source not generate fugitive dust to the extent that some portion of the material escapes and is visible beyond the boundary or property line of the source.

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

Access to the grain loading and unloading dumps at the source is through an unpaved road. Fugitive particulate matter (PM) emissions are greater than 25 tons per year. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate emissions from the unpaved road are controlled by spraying with water on an as needed basis. It is anticipated that this road will be paved by the end of calendar year 2003.

Testing

Compliance testing is not required because no emission unit with a control device has a potential to emit greater than 40 percent of the total source PTE. In addition, the baghouse dust collectors used to control emissions from the truck receiving facilities known as dump 1 and dump 3 need only operate with a collection efficiency of 17% to meet the emission limitations for PM required by 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 6-3-2 (Process Operations). Since these dust collectors have design control efficiencies of 99%, testing is not warranted.

Conclusion

The construction and operation of this country grain elevator shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 173-17164-00011.

Appendix A

Summary of Applicant Submitted PM and PM_{10} Emission Calculations

Process	Grain Throughput (tons/year)	AP-42 Factor for PM (lb/ton of grain)	Uncontrolled PM Emissions (tons/year)	Controlled PM Emissions (tons/year)	AP-42 Factor for PM_{10} (lb/ton of grain)	Uncontrolled PM_{10} Emissions (tons/year)	Controlled PM_{10} Emissions (tons/year)
Receiving (Truck)	797,538	0.180	71.8	0.718	0.059	23.5	0.235
Internal Handling	797,538	0.061	24.2	0.242	0.034	13.6	0.136
Cleaning	797,538	0.075	29.9	0.299	0.019	7.47	0.075
Drying	797,538	0.220	87.7	87.7	0.055	21.9	21.9
Storage Bin Vents	797,538	0.025	9.97	9.97	0.006	2.51	2.51
Shipping (Truck)	797,538	0.086	34.3	3.43	0.029	11.6	1.16
Combustion (Dryer)	-	-	0.266	0.266	-	1.07	1.07
Total			258	103		81.7	27.1

Notes: Grain throughput is based on the highest annual throughput in the past five (5) years, multiplied by 1.2
All grain is assumed to be corn, tonnage is based upon 60 pounds per bushel
Control devices and efficiencies are: Truck Receiving - Baghouse, 99% control;
Internal handling - Baghouse and Enclosures, 99% control
Cleaning - Enclosure, 99% control
Truck Shipping - Socks and Sleeves, 90% control

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: ADM/Growmark
Address City IN Zip: Highway 662, Newburgh, Indiana 47630
MSOP: 173-17164
Plt ID: 173-00011
Reviewer: Patrick Brennan/MES
Date: April 11, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
32.000	280.32

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.266	1.065	0.084	14.016	0.771	11.773

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: ADM/Growmark
Address City IN Zip: Highway 662, Newburgh, Indiana 47630
MSOP: 173-17164
Plt ID: 173-00011
Reviewer: Patrick Brennan/MES
Date: April 11, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.002	0.001	0.075	1.80	0.003
Potential Emission in tons/yr	0.00029	0.000168	0.0105	0.252	0.00048

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	0.0005	0.001	0.001	0.0004	0.002	HAPs
Potential Emission in tons/yr	0.000070	0.000154	0.000196	0.000053	0.00029	0.265

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.